

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	)	
	)	
JARVIS LAMAR JOHNSON	)	CHAPTER: 13
729 Dellwood Drive	)	CASE NO.: 3:14-bk-08738
Smyrna, TN 37167	)	JUDGE: MASHBURN
SSN: XXX-XX-8711;	)	
	)	
Debtor		

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**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: September 8, 2015.**  
**IF A RESPONSE IS TIMELY FILED, THE HEARING DATE WILL BE: September 16, 2015 at 8:30 AM CUSTOMS HOUSE, COURTROOM 1, 701 BROADWAY, 2<sup>ND</sup> FL, NASHVILLE, TN, 37203.**

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**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

COMES NOW THE DEBTOR, by and through the undersigned counsel, and in response to Chapter 13 Trustee, Henry E. Hildebrand, III, Motion to Dismiss, would state as follows:

1. The Debtor lost his job at Asurion, 648 Grassmere Park, Nashville, TN 37211, causing him to fall behind on his plan payments.
2. The Debtor is now employed at The Home Depot, 2455 Paces Ferry Road, Atlanta, GA 30339.
3. A payroll deduction order has already been issued to the new employer. The Debtor has contacted the payroll department to confirm receipt.
4. The Debtor requests that he be allowed to make up the past due payments over the remaining term of his plan.

August 19, 2015

Respectfully submitted,

/s/ M. Todd Jackson  
M. TODD JACKSON  
JACKSON & ASSOCIATES, P.C.  
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**CERTIFICATE OF SERVICE**

I certify that on this 19<sup>th</sup> day of August, 2015, I mailed a copy of the foregoing by First Class Mail to the Office of the Chapter 13 Trustee, PO Box 340019, Nashville, TN 37203; the Office of the US Trustee, 701 Broadway, Nashville, TN 37203; and to the Debtor at the above referenced address.

**/s/ M. Todd Jackson**  
M. Todd Jackson